

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA)	CR. NO. 3:25-cr-00054
)	
)	
v.)	
)	
MOHAMMAD EBRAHIM TORKI HARCHEGANI)	

MOTION FOR RECIPROCAL DISCOVERY

The United States, by and through its undersigned Assistant United States Attorney, respectfully moves that this Honorable Court direct the defendant to make available for inspection and copying each of the following:

A. Pursuant to FED. R. CRIM. P. 26.2 and United States v. Nobles, 422 U.S. 225 (1975):

All prior statements in the possession of the defendant, if any, given by witnesses whom the defendant expects to call at trial, other than the defendant himself. The term "statements" is to be construed by the defendant the same as defined in Fed. R. Crim. P. 26.2 (effective December 1, 1980) and the Jencks Act, 18, U.S.C. §3500¹.

B. Pursuant to FED. R. CRIM. P. 16(b)(1)(A):

All books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody, or control of the defendant and which the defendant intends to introduce as evidence in chief at trial.

¹ Although the authority cited herein does not require the production of statements until after the witness has testified, the Government respectfully requests early disclosure, commensurate with the Government's practice of early disclosure of statements, memoranda of interviews and other discovery.

C. Pursuant to FED. R. CRIM. P. 16(b)(1)(B):

Any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this particular case, or copies thereof, as well as the names and/or opinions of any such experts conducting tests or experiments or examinations, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to their testimony.

D. Pursuant to FED. R. CRIM. P. 16(b)(1)(C):

A written summary of testimony the defendant intends to use under FED. R. EVID. 702, 703 and 705 as evidence at trial. The government requests that this summary describe the opinions of the witness(es), the basis and reasons of such opinion(s) and the qualifications of the witness(es).

Respectfully submitted,

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

By: /s/ Elle E. Klein

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January 28, 2025

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**Certification Pursuant to Local
Rule 12.02 by the United States**

Pursuant to Rule 12.02, Local Rules for the District of South Carolina, the United States certifies that, because of the nature of the attached motion (Motion for Reciprocal Discovery) consultation with counsel for the defendant would serve no useful purpose.

Respectfully submitted,

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

By: /s/ Elle E. Klein
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